— CITY OF PORTLAND —
ENVIRONMENTAL SERVICES
1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204-1912 ▪ Sam Adams, Commissioner ▪ Dean Marriott, Director

August 22, 2007

Mr. Dana Bayuk
Department of Environmental Quality (DEQ)
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

Subject: Review of *Remedial Investigation Workplan, Historical Manufactured Gas Plant Activities, Siltronic Corporation Property, 7200 NW Front Avenue, Portland, Oregon, July 25, 2007*

Dear Dana:

This letter provides comments from the City of Portland to the DEQ on the above-referenced Workplan. The City recognizes that the purpose of the proposed work is to satisfy remedial investigation (RI) objectives related to potential manufactured gas plant (MGP) impacts at and in the vicinity of the Siltronic property. Our comments are directed at those potential pathways (surface water, groundwater, and erodible Doane Creek bank soil) where MGP-related contamination at the Siltronic site may impact Doane Creek and the culvert leading to Outfall 22C. The City offers the following comments.

1. The Workplan proposes to analyze only for a limited set of MGP-related contaminants (e.g., metals, cyanide, VOCs, and PAHs); other harbor-wide COIs or potentially MGP-related contaminants are not proposed for analysis. Based on inline solids sampling immediately downstream of Koppers (see City of Portland TM 22C-2; March 23, 2007), other SVOCs, such as phthalates, are or may be present in discharges from the Koppers area of the NW Natural site (and thus, potentially MGP-related wastes) and should also be analyzed. Additionally, the catch basin results from the Koppers site should be evaluated to determine if there are other contaminants that should be evaluated for offsite migration before the analyte list is finalized.
2. The Workplan proposes to use the Doane Creek bank soil, sediment and surface water analytical results to determine human and ecological exposure point estimates. Because soil and water have a potential to migrate to the river, the results also needs to be compared to Joint Source Control Strategy (JSCS) screening level values (SLVs).
3. The City recommends that bank soil, sediment and surface water samples be collected from the Northwest Drainage Pond, in addition to the four Doane Creek bank soil, sediment and surface water sample locations discussed in Section 4.2 and shown on Figure 16. The pond is the last area of solids settling before it discharges to the river The City evaluated results of various soil samples collected from the pond which showed elevated PAHs in several locations, which suggests potential MGP-related waste (City of Portland TM 22C-3; April 18, 2007). The sampling should be designed to determine nature and extent of potential MGP-related material in the pond.

4. DEQ should consider requiring solids sampling at the end of the Koppers culvert, which discharges into a City culvert under Front Avenue. This would provide a necessary data point to characterize the NW Natural site discharge before it combines with other offsite sources. This will allow a comparison to be made with offsite samples to determine if concentrations are related to historical fill or ongoing sources.

5. The Workplan should clarify how stormwater sample collection will meet the data needs. The Workplan states that surface water should be sampled "with sufficient frequency" to allow a "reasonable understanding of discharge and seasonal variability" (page 9). It also states "3 to 4 surface water samples over varying discharge conditions will be sufficient to basically assess variability and conduct statistical calculations for exposure point estimates" (page 10). The Workplan needs to explain how seasonal variability will be addressed and what conditions will be targeted (e.g., high vs. low flow; high vs. low groundwater; first flush vs. mid-storm). It also needs to explain how 3-4 samples spread over different seasonal conditions would allow for statistical calculations. Based on the level of detail provided, it does not appear that 3-4 samples would be sufficient. Additionally, the Workplan states that sampling is designed to provide a data set consistent with DEQ sampling guidance for stormwater but the JSCS requires sampling a minimum of four stormwater sample events to screen sources to the Willamette River.

6. Table C7 should be updated to screen additional samples against DEQ's July 2007 JCSC SLV revisions. Table C7 in Appendix C presents the target method reporting levels for soil and water samples in comparison to the lowest risk screening levels selected from a number of sources. Most of the MRLs for the water analyses are compared to JCSC SLVs based on the July 2005 JSCS SLV list (Table 3-1) rather than the 2007 revised table.

   The lowest risk screening levels for soil should be the JSCS SLVs. The Workplan lists EPA preliminary remedial goals (PRGs), soil-screening levels for migration to groundwater, etc. While this may be appropriate for soil samples collected from borings advanced on the Siltronic property, the screening levels for Doane Creek bank soil and sediment samples should be based on JSCS SLVs. For clarification, a separate table should be prepared for sediment and surface water samples that lists MRLs and screening levels for COIs that are consistent with the July 2007 update to Table 3.1 of JSCS.

7. The list of metals to be analyzed in water in Tables 3, 4, C3, C4, C5 and C7 should be consistent.

Thank you for your consideration of these comments. Please feel free to contact me at (503) 823-7263 if you have any questions regarding this letter.

Sincerely,

Dawn Sanders
Program Manager
Superfund Program

cc: Karen Tarnow/DEQ
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